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20 October 2016

Charles Horton  
Chief Executive  
Govia Thameslink Railway

Dear Charles

**Approval of Govia Thameslink Railway Limited and Southern Railway Limited (trading as Thameslink, Great Northern, Southern and Gatwick Express) Complaints Handling Procedure (Condition 6 of the Station Licence and GB Statement of National Regulatory Conditions: Passenger)**

Thank you for submitting your draft Complaints Handling Procedure (CHP) for approval. A copy of your revised CHP is attached to this letter, and will be published on our website along with a copy of this letter.

I confirm that we have reviewed your CHP against the 2015 “*Guidance on complaints handling procedures for licence holders*” (the guidance), and can confirm that your revised CHP meets the requirements of Condition 6 of your station licence and GB Statement of National Regulatory Conditions: Passenger (SNRP). We also sought views on your draft CHP from Transport Focus and London TravelWatch.

You have confirmed that where a complaint has not been resolved and your internal procedures have been exhausted, you will provide information on Alternative Dispute Resolution (ADR) to the complainant, in accordance with the Alternative Dispute Resolution for Consumer Disputes (Competent Authorities and Information) Regulations 2015. This information will usually be highlighted to complainants in the second substantive response, when details of Transport Focus and London TravelWatch are also given. We understand that you will identify an approved ADR provider (in this case Ombudsman Services, trading as the Consumer Ombudsman) but that you do not plan to make use of this provider and instead complainants will be advised to contact the existing passenger bodies. Where a complainant does contact Ombudsman Services you have an arrangement in place whereby they will be referred to the relevant passenger body.

This approach appears to discharge the information requirements in the Regulations, however, we will be engaging with ATOC and the Department for Transport as to the application of the ADR regulations more generally and this may result in the need to revisit policies in due course. You will continue to be engaged with developing thinking through your representation at ATOC.



You have informed us that the entire suite of GTR websites (Thameslink/ Great Northern, Southern and Gatwick Express), are being redeveloped, going live by November 2016. You have confirmed that as part of this redevelopment, the websites will be made compliant with all requirements of the guidance. In the interim, you have changed the wording of your websites in order to ensure that passengers have a clear path to complain and that information on your service standards is clearly displayed. Please confirm when this redevelopment work has been carried out and in any case please provide us with an update by 30 November 2016.

In the case of GTR and Southern the relevant passenger bodies are Transport Focus and London TravelWatch. In line with the requirements of the guidance, licence holders must establish an appeals handling protocol where the passenger bodies require this. We understand that these protocols have now been finalised and we expect licence holders to abide by them in their handling of appeals.

Yours sincerely,



**Annette Egginton**



# Complaints handling procedure

## 1. Introduction

You and your feedback are vital to us. We are committed to taking complaints seriously and using the insight we gain to make changes to improve our business.

We know it is important that you are able to make complaints easily and that we respond appropriately with a promise of redress or action. Where we have got it wrong, we accept responsibility and say we are sorry.

We have designed our Complaints Handling Procedure (CHP) to ensure we investigate your complaints and give them fair and careful consideration.

### What is a complaint?

A complaint is when you tell us that you are dissatisfied with our service or our policies or those of our industry partners. You don't have to have bought a ticket to complain - you can make a complaint if you find any aspect of our service unacceptable. It may relate to:

- The quality and standard of services and facilities
- Failure to provide an advertised service
- The conduct or attitude of a member of our staff
- Inappropriate behaviour by a member of staff

## 2. How to make a complaint

You should make a complaint as soon as possible so we can investigate and resolve it promptly. There are various ways you can complain.

### 2.11

#### How to contact us about your complaint

##### In person

As all our staff have had customer service training, you can talk to any of them and they will do their best to support you. When dealing with a complaint our staff will consider:

- Can they resolve it on the spot by giving you an apology, explanation or solution?

- If they can't, can another member of staff help to resolve it then and there?
- Do you they need to refer you or advise how to send your complaint to our Customer Relations team for further investigation?

If you are complaining directly to our staff about something that lies within their area of responsibility, they should make every attempt to resolve it then. If the responsibility for the problem lies elsewhere, they will tell you how to contact our Customer Relations team.

You can talk to local station managers. You may have to make an appointment as they are in charge of more than one station.

We hold regular Meet the Manager events. You can find out when and where we hold them on

**gatwickexpress.com**  
**greatnorthernrail.com**  
**southernrailway.com**  
**thameslinkrailway.com**

##### In writing

You can make your complaint in several ways. You can:

- Send us an email
- Send us a tweet (if you want it to be reported and a reference number provided, we will need to refer you to Customer Relations)
- Complete the feedback form on our website
- Write us a letter
- Pick up a form from one of our stations

At our stations you can find our Customer Relations contact details on the information poster.

##### By telephone

You can speak to one of the team from 07:00 to 22:00 every day except Christmas day.

When you phone us you'll get through to our answering service. You can then choose from the options on offer to speak to the right person. We aim to answer 97% of all calls and 80% of those within 30 seconds.

## By textphone

If you have a hearing impairment you can contact us by textphone from 07:00 to 22:00, every day except Christmas Day.

## 2.2 Information to include in your complaint

It helps us if you can state clearly what happened, why you are making a complaint and what you would like us to do. Please also send us any supporting documents you have, such as tickets or photos. This can help us to deal with your complaint more effectively.

The more information you can give us the better, please try to include the following:

- Your title and full name
- Your email address and mobile or phone number, and your preferred method of communication
- Your full postal address
- Date, time and location of the incident
- If the incident was on a station, the name of the station
- If it was on a train, the time and destination of the train
- If your complaint is about the condition of a facility, where it is, for example:
  - Waiting room on platform two
  - Toilet in the third coach of the train
- If you need someone to act on your behalf, please make sure they provide evidence of your authority to do so.

## 3. How we deal with your complaint

### 3.1 Overview

We have designed our CHP to be simple and streamlined, giving our staff responsibility to resolve complaints quickly. They know when they can deal with a complaint themselves and when they should refer it upwards.

We will investigate all complaints thoroughly to ensure our response is fair and factual. We will give you a full explanation and, where appropriate, an apology. If your complaint includes more than one issue, we will deal with each aspect according to its priority.

We log every complaint with a unique reference number on our database. This means we can keep track of our progress dealing with your complaint, and check we're keeping to our targets for responding to customers.

When we deal with your complaint there are three key questions we consider:

- What are the specific issues?
- What is your expected outcome?
- Is your expected outcome reasonable or achievable?

When we reply with our response, we will address the issues raised in your complaint.

So you can be sure that we will investigate your complaint according to our CHP, you should try to make your complaint within 28 days of the incident. This is the same time limit set in the National Rail Conditions of Carriage for claiming a refund for a delay. We will still deal with complaints made later than this guideline but some information that might assist us is less likely to be available.

### 3.2 Time frame to deal with your complaint

The length of time it takes us to resolve your complaint depends on the complexity of your complaint and what it involves.

You should note the following timescales refer to the day our reply leaves our offices so please allow time for postal delivery. We define working days as Monday to Friday and don't include weekends or bank holidays.

During times of exceptionally high demand we're sometimes unable to meet our response times but we'll make every effort to do so. Please bear with us we will respond as quickly as possible and consult with the appropriate regulators to explain what has happened and how long the situation is likely to last and if we have to arrange emergency response times. We will do our best to keep you updated of progress.

### Complaint handling times

Our aim is to resolve most complaints quickly, so please contact us as soon as possible with the information listed in section 2.2.

We can generally give you a quick response if your complaint arises from an incident we're already aware of. For example, your journey was delayed because of a signaling problem or heavy snowfall. In these types

of cases we won't need to do extensive investigations because we already know the facts of the case.

We aim to send you a full response to a simple complaint within five working days and if our incoming numbers are not being affected by specific circumstances.

For more complex complaints needing investigation, or if we are facing high incoming numbers, we will respond within 20 working days

Some complaints can take longer to resolve as they need further investigation. This can be the case if:

- Your complaint is about several issues
- Your complaint is about an incident we don't already have information about
- Your complaint is complex and we need to investigate
- We need to ask one of our contractors, suppliers or another train operator for more information

We will carry out investigation to establish the facts of an incident to ensure a full and objective response. Our inquiries could include:

- Talking to staff
- Getting statements from witnesses
- Looking at CCTV footage
- Getting data from our automatic ticket gates or smartcard systems

We will let you know we've received your complaint and are making further investigation. We will keep our web site updated if it's likely our response times are being affected by high volumes.

### 3.3 What to do if you're not satisfied with our response

#### Internal appeal

If you're not happy with the way we have answered your complaint, you may wish to contact us again. We will look at the issue and reconsider our position. Please tell us what you want for example:

- We didn't cover all of your main points
- You don't agree with our decision

A senior member of the team will review your original complaint and our response. He or she will re-examine the facts taking into account the reason why you're not happy. We will write to you again telling you whether we

stand by our original decision or have revised it. We will write to you within 20 working days of receiving your request for a review.

#### Appeal to external watchdogs

Alternatively, if you're unhappy with our response you can appeal to Transport Focus or London TravelWatch (consumer bodies set up under Acts of Parliament to protect passengers' interest) who can make representation on your behalf.

You'll need to send them copies of your correspondence with us so they can investigate. They will consider whether we have answered the issues you raised and if our response was factual and contained accurate information. If they think we haven't handled your complaint appropriately they will ask us to reconsider.

You can contact Transport Focus about any issue relating to stations and journeys on our routes, except those that are in the area covered by London TravelWatch, as listed below.

You can contact London TravelWatch about any issue for:

- Journeys within Greater London
- Journeys between Stevenage and London Kings Cross/Moorgate (inclusive)
- Journeys between Bedford and Gatwick Airport (inclusive)
- Journeys between Blackfriars and Sutton/Wimbledon or Sevenoaks
- Journeys between London and Oxted, Redhill, Gatwick Airport, Dorking and London Road (Guildford) (inclusive)
- Journeys between Clapham Junction and Tring (inclusive)

Please see section 9 for their contact details.

If we are unable to resolve your complaint we are required to advise you that "Ombudsman Services" who are providers of Alternative Dispute Resolution (ADR) services for the rail industry could deal with your complaint if we participated in ADR. As Transport Focus and London TravelWatch already provide a mediation service we will not participate in the ADR process offered by Ombudsman Services. If you use this option we will forward your complaint to the passenger bodies.



**Ombudsman Services**  
PO Box 730  
Warrington  
WA4 6WU

Visit: [www.ombudsman-services.org](http://www.ombudsman-services.org)

### 3.4

## Complaints we may not take further

Our staff are trained to remain polite and helpful.

If you use abusive language or an aggressive tone we may stop dealing with your complaint:

- In person: they may walk away, or ask a colleague for help. In extreme circumstances, the police may be called
- On the phone: our staff may end the call after issuing a warning
- In writing: they will reply but tell you it is unacceptable to address our staff in this manner and if we consider your complaint is frivolous we may not take it any further.

We may bring correspondence to an end where it is clear that despite our best efforts we are unlikely to satisfy you.

If we end our correspondence, it will be a manager who makes that decision. We will make sure you have already been referred to Transport Focus or London TravelWatch and we will advise them of our decision.

We will tell you when we're about to stop dealing with your complaint and give you the reasons why. If you write to us about a different issue, it will be treated as any other new complaint.

### 3.5

## Compensation

We will give you compensation in line with the National Rail Conditions of Travel and our Passenger's Charter.

Sometimes, if appropriate, we will offer additional compensation or goodwill gesture. This is usually in the form of National Rail travel vouchers.

You're entitled to compensation under our Delay Repay scheme if one of our trains is delayed by 30 minutes or more.

You can find details of this scheme on our website at

[gatwickexpress.com/delayrepay](http://gatwickexpress.com/delayrepay),  
[greatnorthernrail.com/delayrepay](http://greatnorthernrail.com/delayrepay),  
[southernrailway.com/delayrepay](http://southernrailway.com/delayrepay) and  
[thameslinkrailway.com/delayrepay](http://thameslinkrailway.com/delayrepay),

or in leaflets at our staffed stations.

## 4. Other information

If you have special requirements

If you need a response in a different format or language, we will do our best to provide it.

If we don't have the resources to do this in-house, we will employ translators or ask disability groups for advice. You can find out more here:

[southernrailway.com/your-journey/accessibility/](http://southernrailway.com/your-journey/accessibility/)  
[thameslinkrailway.com/contact-us/terms/dppp/](http://thameslinkrailway.com/contact-us/terms/dppp/)

### Personal information

We will not give your personal information to any other organisation, except the following, and then only if it's necessary for our investigations:

- Other train operating companies
- Transport Focus and London TravelWatch
- Other transport companies, when you ask us to
- Any other public body carrying out its statutory function

When we talk to another organisation we will comply with Data Protection legislation and guidance on handling personal information. Our privacy policy is available on line.

### Complaints about staff

As we expect our staff to be professional and polite to our customers, we take complaints about staff behaviour seriously.

We pass any customer complaints or concerns about staff to the appropriate manager. They will investigate and take any necessary action.

Where we can, we will let you know the position of the manager carrying out the interview and the likely timescale of the investigation but please note we may not be able to tell you the final outcome of our enquiry for internal reasons.

## Complaints about other train operators

All train companies follow the same principles when dealing with complaints. If your complaint covers services provided by another transport company, we will tell you this and forward your comments to them within five days of receiving it.

## Complaints about other organisations or contractors who provide services for us

We will deal with a complaint about another organisation or contractor providing services when it is appropriate and most suitable. It should be noted for some specific issues we may have to forward your complaint to the contractor involved for their attention but we can generally help with:

- Cleaning services
- Car parking facilities
- Customer services
- Facilities management

We require our suppliers to co-operate with our CHP and provide any information we may ask for when we're investigating a complaint.

## Claims for injury or loss

If you have an accident on one of our trains or at one of our stations, or you see something you think is unsafe, please let us know as quickly as possible so that we can take appropriate action.

We always pass comments and complaints about safety on to our Safety Department.

## Personal Injury Claims

If you have had an accident or are injured and wish to make a claim you should write to us at:

**Safety Department  
Govia Thameslink Railway  
Go-Ahead House  
26-28 Addiscombe Road Croydon  
CR9 5GA**

## Damaged Property Claims

If your property has been damaged on our trains or at our stations and you believe we were to blame, please contact us with full details including the date and time of the incident. If possible, please keep the damaged item so you can show it to us if necessary or take photographs of the damage.

# 5. Roles and responsibilities for our Complaints Handling Procedure

## All staff

As you can make a complaint to any member of our staff, we aim to make them aware of our CHP. We encourage staff to try and resolve complaints quickly and as close to the place and time of the incident as possible, but if they can't they will give you contact details for our Customer Relations team or forward on your complaint.

## Customer Relations team

Our team are trained to deal professionally with your comments and complaints, and work within the guidelines laid down in the National Rail Conditions of Travel

New members of our team are given a training package that provides a full understanding of our processes and procedures around handling complaints. Their training includes:

- Our company and our values
- How we expect our customers to be treated
- Interpersonal skills
- Technical skills to use our systems
- Our procedures for handling comments and complaints and information on:
  - Railway geography
  - An overview of the rail network franchise system
  - Ticket types and validity
  - Facilities on our stations and trains
  - Our penalty fare scheme
  - Our Priority Seating scheme

Following initial training new starters work alongside an experienced member of the team, who will give one-to-one coaching.

Once they're fully trained they have the authority to handle complaints themselves. They also know when they need to refer a complaint to a senior member of the team.

In addition there's ongoing training when policies change, when returning from long term sick leave and, if necessary, after quality monitoring.

We conduct regular monitoring sessions to check the overall quality of complaints handling and check on individual staff performance.

### Senior management

Our senior management team has overall accountability for the management and governance of our CHP and ensures that:

- Our staff are appropriately trained to sign off complaints so you can be sure we take your concerns seriously
- We have a consistent approach at all levels of the company in the way we manage, monitor and review our CHP
- We use the feedback from your complaints to improve our service and drive change across all areas of the business through effective reporting.

## 6. How we review and monitor our Complaints Handling Procedure

These procedures, and the commitments we have made, are regularly monitored and audited. The information we take from your complaints and comments is valuable to us.

Every four weeks, or more frequently, we produce internal reports on the comments we've received. They give our directors and managers a better understanding of your opinions. The reports include:

- The number of comments broken down by type, including complaints
- The number of comments that are positive or negative
- An analysis of whether this is an improvement or decline
- How Customer Relations is performing against the service level agreement including response times and the amount of comments replied to

Our Customer Satisfaction Board, chaired by the chief operating officer, considers these reports. Using this information and other sources of customer feedback, we identify improvements or problems, and track the impact that initiatives are having on our performance.

In turn we develop improvement plans which may be based on customer insight.

We provide the Department for Transport and the Office of Rail and Road reports every four weeks. They

use them to confirm we are keeping to the promises made in our Passenger's Charter.

Our customer relations manager reviews our auditing and monitoring procedures annually and makes changes to the CHP if necessary. We

consult with Transport Focus and London TravelWatch during the review.

## 7. Our contact details

### Email:

[customerservices@gatwickexpress.com](mailto:customerservices@gatwickexpress.com)  
[customerservices@greatnorthernrail.com](mailto:customerservices@greatnorthernrail.com)  
[comments@southernrailway.com](mailto:comments@southernrailway.com)  
[customerservices@thameslinkrailway.com](mailto:customerservices@thameslinkrailway.com)

### Twitter:

[@gatwickexpress](https://twitter.com/gatwickexpress)  
[@GNRailUK](https://twitter.com/GNRailUK)  
[@southernrailuk](https://twitter.com/southernrailuk)  
[@TLRailUK](https://twitter.com/TLRailUK)

### App:

Thameslink or Southern App – download free from the App Store and Google Play

### Website:

[gatwickexpress.com](http://gatwickexpress.com)  
[greatnorthernrail.com](http://greatnorthernrail.com)  
[thameslinkrailway.com](http://thameslinkrailway.com)  
[southernrailway.com](http://southernrailway.com)

### Telephone:

(07:00 to 22:00 every day except Christmas Day)

**Gatwick Express:** 0345 850 1530

**Great Northern:** 0345 026 4700,

**Southern:** 0345 127 2920

**Thameslink:** 0345 026 4700

### Textphone:

For all other contacts

**Govia Thameslink Railway  
Customer Services  
PO Box 10240  
ASHBY-DE-LA-ZOUCH LE65 9EB**



## **8. Contact details for Transport Focus and London TravelWatch**

### **Transport Focus**

Email: [advice@transportfocus.org.uk](mailto:advice@transportfocus.org.uk) Website:  
[transportfocus.org.uk](http://transportfocus.org.uk) Telephone: 0300 123 2350

**Fax: 0845 850 1392**

### **Address:**

**Transport Focus  
Freepost RTEH-XAGE-BYKZ PO Box 5594  
Southend on Sea, SS1 9PZ**

### **London TravelWatch**

**Email: [enquiries@londontravelwatch.org.uk](mailto:enquiries@londontravelwatch.org.uk)**

**Twitter: [@LonTravelWatch](https://twitter.com/LonTravelWatch)**

**Website: [londontravelwatch.org.uk](http://londontravelwatch.org.uk)**

**Telephone: 020 3176 2999**

### **Address:**

**London TravelWatch Dexter House  
2 Royal Mint Court London,  
EC3N 4QN**

# GTR internal complaint handling process

## Giving our teams the tools to deal with complaints

### The Customer Relations Team

We develop our people to feel confident, knowledgeable and comfortable with our processes. All Customer Relations (CR) staff receives training on:

- 1 How to identify a complaint using the “Any expression of dissatisfaction” principle
- 2 Managing customer expectations
- 3 How to investigate a complaint
- 4 How to reply - attempting first contact resolution if feasible
- 5 Effective use of our CRM system to correctly log complaints and drive case management

If the customer is not happy with our response CR staff are trained to:

- 1 Manage customer complaints via any channel eg letter, email or telephone call. The team have specialist channels they primarily work on.
- 2 Inform customers of likely timescales via auto response email or during the call.
- 3 Staff will identify key factors in the complaint to help steer an investigation
- 4 Reply to the customer informing them of our findings or provide a suitable answer.
- 5 Staff are aware of the escalation process if a customer is unhappy with an outcome.

### Staff Training

It's essential the team are kept abreast of what's happening on the network and in the industry so they can provide a suitable response, so we:

Provide initial extensive training

- 1 Use our constantly updated Knowledgebase to assist with contacts
- 2 Deliver one to one training aimed at continuous improvement

- 3 Use modular training

- 4 Update the team in real time on emerging issues

Quality Assurance frameworks are in place and ensure correct procedures are followed and that the complaint handling process is accessible and easy to understand. Training is given to all staff and refreshed in line with internal procedures.

### In Detail – our training

New trainees are shown the best way to help customers understand our processes eg link to Passenger Charter, Delay Repay and the National Conditions of Travel.

Some skills are essential attributes and some are taught including soft skills. Quality checking of work takes place during a grad bay period and is an ongoing feature. Personal Development Plans are delivered and a full time on site trainer allows us to train, coach and develop staff on a real time basis.

Team leaders monitor staff progress looking at issue identifiers, for example call times, repeat questions or customer feedback. This is used to manage not only the CR team but feeds into the business as important insight via daily buzz calls.

### The customer view

When a customer logs a complaint via the online form or email, they receive an auto-generated response. This informs them of our target response time SLA's and can be changed according to incoming volumes. This response creates a unique case reference number by which all future communication with the customer is linked. It provides a vital audit trail of all interaction between the customer and GTR.

If a case involves investigation, we'll let the customer know their complaint could take up to 20 working days to resolve. If we are experiencing exceptionally high volumes or severe disruption then we will contact passenger watchdogs and the Office of Rail and Road (ORR) and make them aware.

## Performance

All advisors have a minimum of 8 quality assessments per four weekly period. A quality matrix measures the standard of the individual's response against set parameters and is applied across the board. It includes specifics such as a response being jargon free, referred if necessary, correct request for further information and correct compensation offered.

## Our other teams and how they can deal with complaints

### At our stations

The station team is crucial in dealing with customer complaints when they are taking place or shortly after. The team can help with complaints about:

- Ticket and train running information using the systems at their disposal
- General advice and assistance including practical and involving accessibility
- Disruption
- Compensation

They're trained to be proactive and aware and this is embedded from the point of induction and continues with extended and ongoing training

They are trained to refer customers to Customer Relations when a complaint is more complex or outside of their remit.

### Social media

The social media team deals with real time complaints requiring speedy solutions in particular around:

- Train times and timetabling
- Disruption
- Faults and train cleaning
- Marketing and special offers
- Compensation and refunds

Those complaints that are not able to be responded to via social media including staff complaints, complex or detailed issues and DPA issues are signposted to the Customer Relations team.

All of our teams should feel empowered to own the problem and live the GTR values and translate them into active complaint handling.

## Why customer feedback matters

MI is delivered daily, weekly and monthly and is formed from customer insight based primarily on complaints. Reports look at specific areas including staff complains, smartcards, safety and security and train performance and drive improvement across the business.

Another part of our MI pack is based around our complaint handling and includes reporting on all customer interaction, performance against SLA, inbound and outbound work and how the call centre has performed. A series of scheduled meetings form part of the overall governance to ensure we deliver the best possible customer service and follow all of our required processes.

We keep all of customer information in accordance with DPA instructions so customers can be sure it is kept securely. All sensitive payment information is kept in accordance within Payment Card Industry Data Security and hard copies of letters disposed of securely after being input on our CRM system. Finally information on our CRM system is kept for a specified time dependent on the contact type and then securely removed from the system.

Complaints should be viewed as opportunities – we encourage our teams to take responsibility own the complaint own the customer and live our values.